

UNITED STATES DISTRICT COURT

for the
Southern District of Indiana

FILED

9:15 am, Apr 22, 2020

**U.S. DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
Laura A. Briggs, Clerk**

PIERRE Q. PULLINS

Plaintiff(s)

Case No.

1:20-cv-01221-JMS-DLP

-v-

INDIANAPOLIS RECORDER
CHARITIES INC. DBA THE INDIANAPOLIS
RECORDER

Defendant

COMPLAINT FOR LIBEL AND CONSPIRACY

(Title your document on this line.)

ELECTIONEERING CONCERNING A FEDERAL CAMPAIGN

I am the plaintiff defendant (circle one) in this case and I state as follows:

That on April 20, 2018 the Indianapolis Recorder ran a story (news article) in which the Recorder stated, "Pullins is making his seventh run for Congress, and could not be reached at at by press time." The Recorder then (in the same news story) put a thumbnail picture of Pullins picture and grouped it with the Republican challengers. Pullins is a Democrat.

Pullins believes the Indianapolis Recorder

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never tried to contact him to participate in the news story because the Recorder didn't want to print Pullins concerns and questions about the incumbent Congressman Andre Carson. Pullins believes the Recorder conspired with WTLC a Radio One station and the Indianapolis to censor him (Pullins) and his concerns. Jury Trial Demanded

Date: 4/20/2020

Signed: Terrell Pullins
Filing party

Address and Telephone Number:

6120 Westlake Dr. N Apt B
Indpls, IN 46224
317 797 7190

CERTIFICATE OF SERVICE

I certify that a copy of this document Complaint for Libel
(fill in name of your document)

has been mailed, postage prepaid, upon (insert names and addresses of other parties in space provided):